

Goriune Dudukgian, AK Bar No. 0506051
Nicholas Feronti, AK Bar No. 2106069
NORTHERN JUSTICE PROJECT, LLC
406 G Street, Suite 207
Anchorage, AK 99501
(907) 308-3395 (telephone)
(866) 813-8645 (fax)
Email: gdudukgian@njp-law.com
Email: nferonti@njp-law.com

*Saima Akhtar (New York Bar No. 4661237)
NATIONAL CENTER FOR LAW AND ECONOMIC JUSTICE
50 Broadway, Suite 1500
New York, NY 10004
(212) 633-6967 (telephone)
(212) 633-6371 (fax)
Email: akhtar@nclej.org

*Margaret D. Craig (Mass. Bar No. 569130)
*Kelsey Tavares (Mass. Bar No. 705934)
DLA PIPER LLP (US)
33 Arch Street, 26th Floor
Boston, MA 02110-1447
(617) 406-6000 (telephone)
(617) 406-6100 (fax)
Email: maggie.craig@us.dlapiper.com
Email: kelsey.tavares@us.dlapiper.com

*Christopher M. Young (Cal. Bar No. 163319)
DLA PIPER LLP (US)
401 B Street, Suite 1700
San Diego, CA 92101-4297
(619) 699-2700 (telephone)
(619) 699-2701 (fax)
Email: christopher.young@dlapiper.com

*Sean P. Fulton (Tex. Bar No. 24103727)
DLA PIPER LLP (US)
1900 N. Pearl Street, Suite 2200
Dallas, TX 75201-2482
(214) 743-4572 (telephone)
(972) 692-7272 (fax)
Email: sean.fulton@us.dlapiper.com

LUNDEN DECLARATION IN SUPPORT OF PLAINTIFFS' STATEMENT NOTING A DEATH
Della Kamkoff et. al. v. Heidi Hedberg
Case No. 3:23-cv-00044-SLG
Page 1 of 4

*Bethany M. Bunge (Tex. Bar No. 24120730)

DLA Piper LLP (US)

845 Texas Avenue, Suite 3800

Houston, Texas 77002

(713) 425-8400 (telephone)

(713) 425-8401 (fax)

Email: bethany.bunge@us.dlapiper.com

*Constance I. Du (IL Bar No. 6345766)

DLA PIPER LLP (US)

444 W Lake Street, Suite 900

Chicago, IL 60606-0010

(312) 368-8921 (telephone)

(312) 530-7321 (fax)

Email: constance.du@us.dlapiper.com

**admitted pro hac vice*

Attorneys for Plaintiffs

IN THE UNITED STATES DISTRICT COURT FOR

THE DISTRICT OF ALASKA

Della Kamkoff, John Andrew, Kayla Birch,
Rose Carney, Tereresa Ferguson, Zoya
Jenkins, Troy Fender, Rhonda Conover,
Autumn Ellanna, and Nataliia Moroz, on
behalf of themselves, and all those similarly
situated,

Plaintiffs,

v.

Heidi Hedberg, in her official capacity As
Commissioner of the Alaska Department of
Health.

Defendant.

Case No. 3:23-cv-00044-SLG

LUNDEN DECLARATION IN SUPPORT OF PLAINTIFFS' STATEMENT NOTING A DEATH

Della Kamkoff et. al. v. Heidi Hedberg

Case No. 3:23-cv-00044-SLG

Page 2 of 4

Case 3:23-cv-00044-SLG Document 75-1 Filed 12/23/24 Page 2 of 4

**DECLARATION OF SARA LUNDEN IN SUPPORT OF
PLAINTIFFS' STATEMENT NOTING A DEATH**

Sara Lunden declares under penalty of perjury:

1. I am an attorney with the National Center for Law and Economic Justice, one of the firms representing the named plaintiffs and plaintiff classes in the above-entitled action.

2. I am familiar with the facts and circumstances of this case.

3. I make this declaration in support of plaintiffs' statement noting a death.

4. On December 4, 2024, I spoke with Davis Kamkoff. Mr. Kamkoff told me that his wife, Della Kamkoff, died in August 2024, and that he would like to succeed her in the lawsuit.

5. I identified two social media references to Della Kamkoff's death. One is a post by Davis Kamkoff on TikTok from September 26, 2024 available here: <https://www.tiktok.com/t/ZP8NQwv69/>. The other is a Facebook post from August 9, 2024, by a different family member, Genneva Kamkoff. The post is available here: <https://www.facebook.com/share/p/15dSyEX1tf/>.

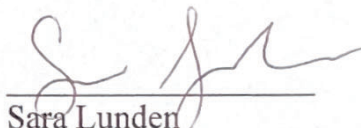
6. Plaintiffs' counsel has also identified a "Go Fund Me" page from August 5, 2024, that had been set up to help pay for Kamkoff family expenses when Della Kamkoff was in the hospital prior to her passing, available here: <https://www.gofundme.com/f/support-della-kamkoffs-icu-recovery?qid=1fb5fbda7ae808127e0bb7891790ba5a>.

7. Plaintiffs' counsel informed counsel for the Defendant of Della Kamkoff's death on September 20, 2024 by email.

8. Plaintiffs' counsel informed counsel for the Defendant that Plaintiffs intend to file a motion to substitute Davis Kamkoff as a successor named plaintiff and class representative for Della Kamkoff on December 6, 2024 by email.

9. On December 9, 2024, counsel for the Defendant informed Plaintiffs' counsel by email that she will not oppose Plaintiffs' motion to substitute.

DATED this 23rd day of December, 2024 at New York, New York.


Sara Lunden